



立法會 CB(2) 1127/03-04(03)號文件  
LC Paper No. CB(2) 1127/03-04(03)

Date: 26/1/2004

Mrs. Constnace Li  
Clerk to Panel  
Legislative Council Secretariat  
3/F, Citibank Tower,  
3 Garden Road  
Hong Kong

Dear Sir or Madam:

**Subject: Comments on Nutrition Labeling Scheme**

The Hong Kong Nutrition Association (HKNA) would like to comment on the Consultation Paper on Labeling Scheme on Nutrition Information, issue on November 2003.

The HKNA fully agrees to launch and support the introduction of a nutritional labeling scheme in Hong Kong, as we believe that a well-designed nutritional labeling scheme can bring benefits and conveniences including but not limited to the followings:

1. Making accurate and evidence-based health information more available to interested publics, in order words, prevent printing of misleading nutrition information/claims that may cause harm to the general public;
2. Increase the practicality of therapeutic diets;
3. Help to promote healthy eating;
4. Aid in effective and accurate product-to-product comparisons, and therefore allow healthier food choices being made;
5. Act as a form of nutrition education for the general public;
6. Facilitate and encourage the manufacturing of healthier food products.

Here are specific comments and suggestions for various parts of the paper:

- 1) Overall proposal
  - a) HKNA agrees to implement a mandatory nutrition labeling system for prepackaged food products, with a set of local Nutrient Reference Values (NRV) and a set of tolerance limits of the nutrient verification.

2) Labeling Requirement

- a) HKNA agrees on the **Coverage** of the labeling requirements specified in section 6.4 to 6.6.
- b) HKNA agrees on the **Rationale** of the labeling requirement specified in section 6.7 to 6.8. *However, the term “foods for special dietary uses”, specified in section 6.9, needs to be further clarified to prevent foods with false and misleading names to be included under this category. For example, a bar of chocolate with artificial sweetener might label itself as “suitable for diabetes” and may be classified as foods for special dietary uses. However, it can still lead to increased risk of obesity if consumed excessively. There needs to be regulations installed to prevent any abuse of this exempted category.*

3) Core Nutrients

- a) HKNA agrees on the rationale and nutrients to be included in the core nutrient list, specified in section 6.10 to 6.20. The core nutrient list will contain energy, protein, carbohydrate, fat, saturated fat, cholesterol, fiber, calcium, sodium and sugars.

4) Other Nutrients

- a) HKNA agrees on the allowance of the listing of vitamins and minerals with NRV established on a voluntary basis, stated in section 6.21 and 6.22.

5) Nutrient for which a claim is made

- a) The HKNA agrees on the nutrient claim requirements stated in section 6.23 and the rationale in 6.24.

6) Nutrient Content Expression

- a) The HKNA agrees on the requirements stated in section 6.25 and 6.26.

7) Presentation of Nutrient Content

- a) The HKNA agrees that all food products carrying nutrient-related claims should provide nutrition labeling during Phase I.

8) Nutrient Content Claim

- a) The HKNA agrees that only nutrients mentioned in section 6.30 can make nutrient content claims, and which a set of local NRVs shall be established.
- b) *When developing the local NRVs, the HKNA suggests to get that the government shall sought views from different nutritional professionals including professional nutrition societies and universities.*
- c) *The HKNA supports using the dietary reference intake from China as a reference, in view of the fact that*
  - i) *Chinese remains as the major population in Hong Kong;*

- ii) *Most imported foods to Hong Kong are imported to China as well, and having a different set of NRV may create obstacles for these potential food importers.*
      - d) *While using the DRI from China, please keep in mind some of the nutrients might needed to be revised based on the local data.*
      - e) *The HKNA agrees on sections 6.31 and 6.32.*
- 9) **Nutrient Comparative Claim**
  - a) *The HKNA agrees on sections 6.34 to 6.37.*
- 10) **Nutrient Function Claim**
  - a) *The HKNA agrees on sections 6.38 to 6.40.*
- 11) **Timeframe of the Implementation**
  - a) *The HKNA feels that phase II of the labeling system should be implemented immediately after phase I, in order to speed up mandatory nutritional labeling, which can bring benefits to the public at a faster pace.*
- 12) **Accuracy of Nutrition Information**
  - a) *The HKNA understands that it is not economically feasible for many food manufacturers to analyze their food product with chemical analysis, and the HKNA agrees that analysis done with reputable nutrient database would be acceptable. However, the HKNA strongly feel that a **monitoring system** must be installed in order to ensure the accuracy of the nutritional information, in order to:*
    - i) *gain control from the side of the FEHD;*
    - ii) *ease the spot checking process performed by FEHD*
  - b) *In addition, the HKNA suggests that the government to make it mandatory for food manufacturers to report on the following:*
    - i) *method of the food analysis -- food database nutritional analysis, versus chemical analysis;*
    - ii) *source of service of the food analysis;*
  - c) *And the government to keep a searchable database of the above items for the interested publics.*
- 13) **Public Education**
  - a) *As indicated in the consultation paper, the amount of information provided needs to be in a balance with the general level of knowledge of the public on nutrition information. The HKNA believes that various nutrition education shall be provided to:*
    - i) *The general public,*

*ii) Health professionals, and*

*iii) Food manufacturers*


*in order to enhance the effectiveness of a nutritional labeling system.*

*14) Clarification of The Exemption List*

- a) The HKNA suggests to have a more specific exemption list for the labeling scheme;*
- b) The following items need to be clarified for their eligibility for exemptions:*
  - i) Preserved meats such as Cantonese sausage (臘腸) and Cantonese preserved meats “臘肉”, and etc.*
  - ii) Tea including Asian and Western teas.*
  - iii) Traditional foods consumed during Chinese festivals such as mook-cake, New Year cake, Chinese Tamale (糰), and etc.*
  - iv) Single packaged bake goods sold in bakery shop.*
- c) Infant Formulas and Special Dietary Foods*
  - i) The HKNA suggests fully adapting the regulating criteria from the World Health Organization.*

Thank you very much for your kind attention. Shall there be more views sought from the HKNA, please contact us at [info@hkna.org.hk](mailto:info@hkna.org.hk).

Best regards,



June Chan  
President  
Hong Kong Nutrition Association



Fax

To: Ms. Constance Li 2509 0775

From: Ms. June Chan 2849 2604

President

Hong Kong Nutrition Association Ltd.

Dear Ms. Li,

Please find the attached written reply on the Food Labelling Scheme Consultation Paper. Please feel free to contact me again if further information is needed.

Thank you very much for your attention.

Sincerely,

June Chan

President (2003-2004)

Hong Kong Nutrition Association Ltd.